2 3 4	IRELL & MANELLA LLP David Siegel (101355) dsiegel@irell.com Charles Elder (186524) celder@irell.com 1800 Avenue of the Stars Los Angeles, CA 90067 Telephone: 310-277-1010 Facsimile: 310-203-7199			
6	Attorneys for Defendants TESLA MOTORS, INC. and ELON MUSK			
8	UNITED STATES DISTRICT COURT			
9	NORTHERN DISTRICT OF CALIFORNIA			
10	SAN FRANCISCO DIVISION			
11				
12	ROBERT RAHIMI, Individually and On Behalf of All Others Similarly Situated,) Case No. 3:13-CV-05216-CRB		
13	Plaintiff,	STIPULATION AND ORDER TO EXTEND TIME TO RESPOND TO		
14 15	V. TESLA MOTORS, INC. and ELON) COMPLAINT AND TO MODIFY) BRIEFING SCHEDULE AND PAGE) LIMITATIONS;		
16	MUSK,	DECLARATION OF CHARLES ELDER IN SUPPORT		
17	Defendants.	Hon. Charles R. Breyer		
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23	WHEREAS Plaintiff Robert Rahimi filed this putative class action on			
24	November 8, 2013, asserting claims under Sections 10(b) and 20(a) of the Securities			
25	Exchange Act of 1934 on behalf of a purported class of purchasers of defendant			
26	Tesla Motors, Inc. common stock;			
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		Ctin to Evtend Time to December 1		

1	WHEREAS the Court appointed Mr. Kazim Acar as lead plaintiff in this case	
2	on February 14, 2014, and gave him and Mr. Rahimi (together "Plaintiffs") 60 days	
3	to amend their pleading;	
4	WHEREAS on April 16, 2014, Plaintiffs filed their First Amended Class	
5	Action Complaint (the "Amended Complaint"), which is 86 pages long, plus	
6	exhibits;	
7	WHEREAS Defendants plan to file a motion to dismiss;	
8	WHEREAS the parties have agreed on a briefing schedule in which	
9	Defendants have until June 16, 2014, to file a motion to dismiss the Amended	
10	Complaint, Plaintiffs will have until August 7, 2014 to file an opposition, and	
11	Defendants will have until August 29, 2014 to file a reply, with a hearing during the	
12	week of September 22, 2014;	
13	WHEREAS counsel for Plaintiffs, understanding that this Court typically	
14	hears motions on Fridays, respectfully requests that the Court accommodate his need	
15	to travel to and from the East Coast by scheduling the hearing for either Tuesday,	
16	Wednesday or Thursday of that week; Defendants do not object to this	
17	accommodation, and are available for the hearing any day during the week of	
18	September 22, including Friday, September 26, 2014;	
19	WHEREAS in view of the 86-page length of the Amended Complaint, the	
20	parties agreed that the page limit set forth in this Court's standing order, with the	
21	approval of the Court, would be increased to the page limits set by Local	
22	Rule 7-4(b) for the memorandum of points and authorities (25 pages) and the reply	
23	(15 pages) and to 30 pages for the opposition.	
24	WHEREAS, the requested time modifications will have no other impact on	
25	the schedule for the case;	
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1	THEREFORE, IT IS HEREBY STIPULATED AND AGREED, by and			
2	between the parties hereto, by their undersigned attorneys, and subject to approval			
3	by the Court, that:			
4	A. Defendants have until June 16, 2014, to file a motion to dismiss the			
5	Amended Complaint, Plaintiffs have until August 7, 2014 to file an opposition, and			
6	Defendants have until August 29, 2014 to file a reply.			
7	B. Page limits for the memoranda of points and authorities in support,			
8	opposition and reply shall be: 25 pages for the opening memorandum of points and			
9	authorities, 30 pages for the opposition, and 15 pages for the reply, in addition to the			
10	summary of argument required by this Court's Standing Order.			
11	C. The hearing on the motion to dismiss shall be scheduled during the			
12	week of September 22, 2014, to the extent possible on one of Tuesday, September			
13	23, 2014, Wednesday, September 24, 2014, or Thursday, September 25, 2014.			
14				
15	Dated: May 27, 2014 Respectfully submitted,			
16	IRELL & MANELLA LLP			
17				
18	By: /s/ Charles Elder			
19	Charles Elder Attorneys for Defendants			
	Attorneys for Defendants			
20	Dated: May 27, 2014 POMERANTZ LLP			
21				
22	By: /s/ Matthew Tuccillo			
23	Matthew Tuccillo Jeremy Lieberman			
24	600 Third Avenue			
25	New York, NY 10016			
	mltuccillo@pomlaw.com			
26	Telephone: (212) 661-1100			
27	Facsimile: (212) 661-8665			
28	Attorneys for Plaintiff			

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SIGNATURE ATTESTATION

I hereby attest, per the Court's Civil L.R. 5-1(i)(3), that concurrence in the filing of this document has been obtained from Matthew L. Tuccillo, Esq.

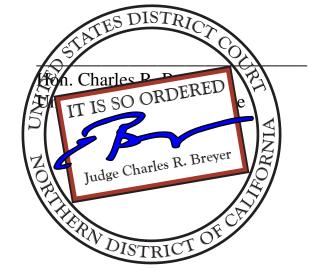
/s/ Charles Elder Charles Elder

ORDER

PURSUANT TO STIPULATION, IT IS HEREBY ORDERED THAT:

- A. Defendants have until June 16, 2014, to file a motion to dismiss the Amended Complaint, Plaintiffs have until August 7, 2014 to file an opposition, and Defendants have until August 29, 2014 to file a reply.
- B. Page limits for the memoranda of points and authorities in support, opposition and reply shall be: 25 pages for the memorandum of points and authorities, 30 pages for the opposition, and 15 pages for the reply, in addition to the summary of argument required by this Court's Standing Order.
- C. The hearing on the motion to dismiss shall take place on September 26, 2014 at 10:00 a.m.

Dated this 23rd day of May, 2014



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